

EXHIBIT 12

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS,

Plaintiff,

v,

No. 22-cv-10904-JSR

JPMORGAN BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,
Third-Party Plaintiff

v.

JAMES EDWARD STALEY,
Third-Party Defendant.

THE ORAL DEPOSITION OF ALBERT BRYAN, JR. was
taken on the 6th day of June, 2023, at the Law Offices
of Joel Holt, 2132 Company Street, Christiansted, St.
Croix, U.S. Virgin Islands, between the hours of 8:42
a.m. and 3:47 p.m. pursuant to Notice and Federal Rules
of Civil Procedure.

Reported by:

DESIREE D. HILL
Registered Merit Reporter
Hill's Reporting Services
P.O. Box 307501
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1 Q. Okay. So there were two topics that came
2 up in the meeting then, the environmental topic and
3 his reporting as a sex offender, you mean?

4 A. Right.

5 Q. What did he say about that?

6 A. He just wanted to have more leniency in
7 terms of being able to leave the island on a moment's
8 notice. As most of our wealthy residents here, they
9 have jets and boats. British Virgin Islands, there's
10 a lot of things close by. So I guess from time to
11 time when he wanted to leave he could not.

12 Q. All right. What did you state to him about
13 that topic?

14 A. Well, I didn't know what the rules were.
15 So I just told him I would inquire about it, and when
16 I inquired, it was not available for him to do it.

17 Q. All right. What did you understand at that
18 time about why Mr. Epstein was required to register as
19 a sex offender?

20 A. I mean, more than just understanding that
21 all sex offenders are required to list their
22 residence, nothing else.

23 Q. What, if anything, did you know about what
24 he had done that led him to being a registered sex
25 offender?

1 A. At the time, I figured he -- well, I knew
2 he was arrested in Florida and he had pled to a
3 charge. At the time I didn't know that the charge
4 was having to do with prostitution and young women.

5 Q. So at this time, is to be all the way into
6 2019, you didn't know anything more than it had
7 something to with prostitution and young women?

8 A. That's correct.

9 Q. All right. Anything else that you can
10 remember about this second meeting with Mr. Epstein?

11 A. Other than he -- I mean, the most
12 significant thing about the meeting was he came in a
13 helicopter.

14 Q. That stood out in your mind?

15 A. Yeah.

16 Q. To Erika Kellerhals' office?

17 A. Yes.

18 Q. Was there like a helipad nearby? How does
19 that work?

20 A. Well, the hospital. Schneider Regional
21 has a helipad and it's across the street essentially.

22 Q. Got it. How did you know he had come by
23 helicopter?

24 A. You could see the helicopter. I mean, it
25 is literally right in front of the office, so.

1 we could take a break now.

2 Q. (By Mr. Neiman:) You want a break or you
3 want to take a look at the document?

4 A. No, I'm good.

5 (Deposition Exhibit No. 36 was
6 marked for identification.)

7 Q. Let's me show you a document marked as
8 Exhibit 36. Exhibit 36 is an article from the Virgin
9 Islands Daily News. Do you see that?

10 A. Yes.

11 Q. And is that a newspaper that you read?

12 A. No.

13 Q. You don't read it?

14 A. Yes, I do.

15 Q. You do. You have to. Kind of doing your
16 job, right?

17 A. I have to. That's a better word of it, I
18 have to.

19 Q. Maybe not your choice but you got to.

20 A. Yeah.

21 Q. You can see this is an article from
22 July 12th of 2019 headline "Local authorities not
23 currently investigating Epstein." You see that?

24 A. Yes.

25 Q. All right. And do you think you would have

1 seen this article at the time it came out?

2 A. No.

3 Q. Why not?

4 A. I mean, I'm not particularly, you know --
5 I wasn't following the Epstein thing, to be quite
6 honest.

7 Q. You see in the second page of the article,
8 it reads, "While at least one individual has said in a
9 civil lawsuit in New York that she was sexually abused
10 at Epstein's home on Little St. James."

11 A. Yes.

12 Q. That would be a topic of interest to you,
13 wouldn't it?

14 A. (Witness reading article.) Yes.

15 Q. You don't remember learning that in July of
16 2019?

17 A. No, I don't. I remember the attorney
18 general making a public statement that said, None of
19 these victims were from the Virgin Islands. That's
20 what I remember. At that point, I turned my
21 attention elsewhere.

22 MR. ACKERMAN: Still want to take
23 a break?

24 THE WITNESS: You were saying
25 after the document.